

The Hon. Ricardo S. Martinez
Chief United States District Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DANIEL RAMIREZ MEDINA,
Plaintiff,
v.
U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,
Defendants.

Case No. 2:17-cv-00218-RSM-JPD

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S THIRD AMENDED
COMPLAINT**

Noted for Consideration: June 4, 2019

Pursuant to LCR 10(g), Defendants U.S. Department of Homeland Security, *et al.*, and Plaintiff Daniel Ramirez Medina (together, "the Parties"), hereby stipulate to seek an order of the Court extending the time for Defendants to respond to Plaintiff's Third Amended Complaint [ECF No. 140, filed May 30, 2019] by 4 weeks. Pursuant to Fed. R. Civ. P. 15(a)(3), Defendants' current response deadline is June 12, 2019. Under the Parties' stipulation, Defendants' new response deadline would be July 10, 2019.

Good cause exists to extend Defendants' deadline where counsel for Defendants' were preparing for a hearing on May 31, 2019, which was ultimately canceled late in the day on May 30, and are presently preparing for a Ninth Circuit oral argument on June 13, 2019, in an appeal of the DACA-related case, *Inland Empire-Immigrant Youth Collective v. Duke*, 2017 WL 5900061 (C.D. Cal. Nov. 20, 2017). Counsel for Defendants have additional filing deadlines as

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(202) 532-4468

1 well as the upcoming July 4th holiday that further justify this requested 4-week extension to a
2 new response deadline of July 10, 2019.

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4 It is so ordered, this ____ day of June, 2019.

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1 DATED: June 4, 2019 Respectfully submitted,

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/s/ James J. Walker

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 4, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record *via* transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ James J. Walker

JAMES J. WALKER

Trial Attorney

U.S. Department of Justice